

# MEMO ENDORSED

July 27, 2018

VIA ECF

Honorable Richard M. Berman  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

*United States v. Usher et al.*, No. 17-cr-19 (RMB)

Dear Judge Berman:

The parties' motions in limine are due by August 1, 2018. The defendants write to request leave for the parties to submit briefs longer than those prescribed by Rule 2(C) of Your Honor's Individual Practices.

As the Court is aware, the indictment charges three defendants jointly. The defendants currently anticipate moving in limine on four discrete issues. The defendants understand that the government expects to move in limine on three additional issues.

For the Court's convenience, and in keeping with common practice before the Court, the defendants intend to compile their moving arguments in a single, omnibus brief. They intend to do the same in their papers opposing the government's motions in limine. The defendants will keep their presentations concise. However, we believe that a fair presentation of the issues will require up to 32 pages for each omnibus moving brief, and up to 32 pages for each omnibus opposition brief.

The government does not join this request, but asks (consistent with the defendants' request) that any relief be granted equally to all parties.

Respectfully Submitted:

Michael Kendall  
Mark Gidley  
Andrew Tomback  
*Counsel for Richard Usher*

Heather Tewksbury  
Anjan Sahni  
Thomas Mueller  
*Counsel for Rohan Ramchandani*

David Schertler  
Lisa Manning  
*Counsel for Christopher Ashton*

cc: Counsel for the Government

Lets Keep omnibus moving + opposing briefs to 25 pp, double spaced-- both for the Dofs + the Govt. Each Def may submit a 2pp supplement to omnibus moving + opposing briefs addressing issues unique to them. SO ORDERED: Date: 7/30/18 Richard M. Berman Richard M. Berman, U.S.D.J.
--

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/30/18
--